

UNITED STATES DISTRICT COURT

for the

Northern District of New York

Albany Division

Rahul Dev Manchanda,

Case No.

1:25-cv-487 (GTS/mJK)

(to be filled in by the Clerk's Office)

Plaintiff(s)

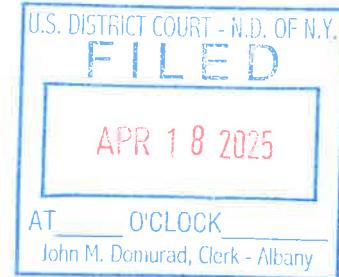
(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Attorney Grievance Committee 1st Department, NYS Supreme Court Appellate Division 1st Department,

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) Yes No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Rahul Dev Manchanda (Pro Se)
Street Address	270 Victory Boulevard
City and County	New Rochelle (Westchester County)
State and Zip Code	New York 10804
Telephone Number	(646) 645-0993
E-mail Address	rdm@manchanda-realestate.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	<u>Attorney Grievance Committee 1st Department</u>
Job or Title (<i>if known</i>)	
Street Address	<u>180 Maiden Lane, 17th Floor</u>
City and County	<u>New York (New York County)</u>
State and Zip Code	<u>New York 10038</u>
Telephone Number	<u>(212) 401-0800</u>
E-mail Address (<i>if known</i>)	

Defendant No. 2

Name	<u>NYS Supreme Court Appellate Division 1st Department</u>
Job or Title (<i>if known</i>)	
Street Address	<u>27 Madison Avenue</u>
City and County	<u>New York (New York County)</u>
State and Zip Code	<u>New York 10010</u>
Telephone Number	<u>(212) 340-0400</u>
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 USC § 1983,
US Const.Amend.I, V, VI;
Five Presidential Executive Orders/Actions/Proclamations;
NY Const Art I §§ 6, 8

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____. Or is incorporated under the laws of *(foreign nation)* _____, and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

20,000,000

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See attached detailed statement of claim/complaint.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

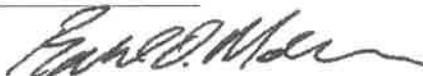
- (1) Reinstate Petitioner's license to practice law in NYS State;
- (2) Damages To Be Determined

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 04/17/2025

Signature of Plaintiff

Printed Name of Plaintiff

Rahul Dev Manchanda (Pro Se)

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

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Plaintiff, Rahul Manchanda, in response to an April 10, 2025 Dismissal of his Appeal by the New York State Court of Appeals located at 20 Eagle Road, Albany New York 12207 by Chief Judge Rowan Wilson, and in support of this Appeal to the US District Court, Northern District of New York, Albany Division against Defendants, alleges:

Jurisdiction

1. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case..
2. The bases of federal question jurisdiction are 42 USC § 1983, US Const.Amend.I, V, VI; Five Presidential Executive Orders/Actions/Proclamations; and NY Const Art I §§ 6, 8.
3. We are currently suing for \$ 20,000,000 which represents the annual gross income Petitioner would have gained over the next 20 years of his formerly successful and ethical law firm practice.

STATEMENT OF THE CLAIM

QUESTIONS PRESENTED

- (I) What is the remedy when the highest state court, in this case the New York State Court of Appeals, as well as New York State attorney licensing agencies (here the Attorney Grievance Committee First Department or “AGC”) and courts (here the New York County Supreme Court, Appellate Division 1st Department) defies and ignores at least five (5) newly issued President Donald Trump Executive Orders, Presidential Proclamations, Executive Orders for political reasons, because the defiers are predominantly Democrat, communist, leftist, extreme activist judges and government employees, while President Donald Trump is a conservative, right wing, Republican?
- (II) What is the remedy when a lower court, in this case, the New York County Supreme Court, Appellate Division, 1st Department and the Attorney Grievance Committee 1st Department target and disbar a licensed and successful Attorney owning a successful law firm for nearly 25 years in Manhattan New York City, simply because that Attorney happens to be a Republican, conservative, Christian values Lawyer, based on allegations that have not been proven, authenticated, or demonstrated, with “exhibits” evaluated by an “arbitrator” who is of advanced age, suffers from mental and physical challenges such that she is considered to be disabled, and whereby the use of ~~this arbitrator by the aforementioned New York state court and licensing agency knowingly use her as a form of “Elder Abuse” in issuing erroneous conclusions of law and fact, thus resulting in Plaintiff’s permanent disbarment from the practice of law?~~

(III) Is it unlawful retaliation for the aforementioned New York State Attorney Licensing Agency and Court to summarily disbar a 25 years experienced lawyer, simply for filing government requests for investigation and complaints, plus civil rights lawsuits against certain New York City governmental agencies for allegations of bias, discrimination, and racism based on his Republican political positions, Christian religious values, male gender, Indian-American ethnicity, and heterosexual identity, which is at odds with the vast majority of New York City government employees in those institutions, who happen to be predominantly leftist, communist, Democrat, activist judges and government employees, of African-American descent, with predominantly Jewish supervisors, as well as LGBTQ+ activists and extremists, by gaslighting and instead accusing the targeted lawyer as being “racist,” “anti-semitic,” “homophobic,” or a “vexatious litigator” in response to those legitimate, protected, government complaints and civil law suits?

Parties to the Proceedings

4. Rahul Dev Manchanda was the Respondent in the New York Attorney Grievance Committee 1st Department attorney disciplinary proceedings, and is now the Petitioner in these proceedings in this Court;
5. The Attorney Grievance Committee First Department, Staff Attorneys Remi Shea and Andrea Carter and Chief Counsel Jorge Dopico, and New York County Supreme Court Appellate Division 1st Department Chief Judge Dianne Renwick, were the named appellants in the lower-court proceedings, and are now the Respondents in these proceedings in this Court.

Judicial Orders Below

6. In re Rahul Dev Manchanda, on November 21, 2024, the New York County Supreme Court Appellate Division 1st Department issued an order to disbar. In re Rahul Dev Manchanda, on December 4, 2024, the New York State Court of Appeals Judge Jenny Rivera declined to sign Petitioner’s Order to Show Cause requesting an Emergency Injunction but indicated that the issue of Jurisdiction was still pending before the Court, without any finding of fact. Petitioner then sought an Injunction with the United States Supreme Court on December 13, 2024, but Associate Justice Sonia Sotomayor denied the application for injunction on December 30, 2024. Still pending before the New York State Court of Appeals was the Jurisdictional Analysis, but on April 10, 2025 Chief Judge Rowan Wilson dismissed the appeal for lack of jurisdiction, without any finding of fact or adjudication on the merits. And so now we are here with an Appeal to this Court seeking relief, and if not successful in this forum, we will be forced to prepare and file a Petition for Writ of Certiorari in front of the U.S. Supreme Court of the United States of America on appeal from any further negative decisions.

STATEMENT OF THE CASE

Background and Overview

7. Plaintiff, at all times relevant hereto, was a lawyer for 25 years owning his own successful

Wall Street New York City law firm for 22 years, until he was summarily and without reason disbarred on November 21, 2024, said disbarment becoming permanent on December 21, 2024.

8. Plaintiff, an Indian American lawyer and litigant born and bred in Mt Kisco, Westchester County, New York in 1972, for 20 years starting in 2004 was getting battered in the New York City family, criminal, and civil courts, wherein he lost his children and has not seen or spoken to them since November 2017, in violation of a still existing visitation order and schedule, only prevented by activist extreme feminist and lesbian judges, racist law clerks, LGBTQ+ and biased court administrators, who routinely would lose his motions, sabotage his filings, not mail to him notices, arbitrarily and capriciously threaten him with contempt or arrest with local corrupt police officers who actually have falsely arrested him merely for trying to see his own kids on their birthdays and other family court agreed upon visitation days, wherein Plaintiff was simply and peacefully trying to see his own kids.
9. Therefore, Plaintiff filed a series of protected speech government complaints, civil rights lawsuits, and law enforcement investigation requests, citing bias and discrimination by, what could only be objectively described as the two most dominant and powerful ethnic groups within the New York City judicial legal system (their names were provided), communist, leftist, socialist, Democrat Jews and Blacks, including LGBTQ+ activists and extremists.
10. This was obviously a proverbial legal and equitable “bomb” that was dropped on the entire New York City legal community, because it had never been done before.
11. However, as Plaintiff was soon to find out, by doing so, simply requesting government

investigation into the same, he had no idea how the entrenched and corrupt powers that occupy the highest seats of power and influence within the New York City judicial, executive, and legislative branches of government, in both federal, state, and local levels, would uniformly react, stick together, circle the wagons, and then collectively retaliate.

12. The Attorney Grievance Committee First Department (“AGC”) led by Staff Attorney Remi Shea and the New York County Supreme Court Appellate Division First Department (“Appellate Division”) led by Chief Judge Rolando Acosta and Diversity, Equity, Inclusion (“DEI”) hire Chief Judge Dianne Renwick, used an extremely incompetent, mentally deficient, elderly, confused, judicial retiree named Rosalyn Richter as a “Referee Arbitrator,” who could not even walk by herself, speak properly, or write by herself, in order to wade through their thousands of pages of retaliatory false “exhibits” which consisted of alleged “discriminatory acts” that they falsely attributed to Plaintiff over the last 25 years of a legal career, and 23 years of his own private successful law practice located on Wall Street New York, all in retaliation for his first filing protected government complaints, civil rights lawsuits, and law enforcement investigation requests, after 20 years of non-stop judicial, law clerk, and administrative communist, leftist, socialist, Democrat abuse of him in his family court matters, involving custody and visitation rights with his kids.

13. The documentary evidence was clear that I was being ganged up on and discriminated against by the two most dominant ethnicities in the New York City Judicial/Legal system, by communist, leftist, socialist, Democrat African-Americans and their predominantly Jewish supervisors, who were involved in, empirically, 99% of the negative adverse decisions against Plaintiff, over a 20 year period (their names were provided in government complaints and lawsuits, including but not limited to, NYC African-American Judges Gregory Woods,

Dakota Ramseur, Cheryl Weir Reeves, Clark Richardson, Vernon Broderick, Andrew Carter, Dianne Renwick, Tandra Dawson, George Daniels, Damian Williams, Eric Adams, Debra James, Carolyn Walker Diallo, Milton Tingling, Raymond Lohier, Andrea Lewis, Andrea Carter, Edwina Richardson, Machelle Sweeting, Erika Edwards, Vanessa Bryant, Troy Webber, Tanya Kennedy, Christina Ryba, Rowan Wilson, Peter Sherwood, Carol Jordan, Janet C Malone, and many others, all of whom ruled against me in different courts of law, mostly pertaining to retaliation for complaining about mistreatment or my Family Court matters involving custody and visitation of my children, whom I have not seen or spoken to since November 2017, under threat of my equally leftist, Democrat, LGBTQ+, former stripper, ex-wife, Sharie Maes (aka Sharie Manon, Sharie Kruzic, Sharie O'Buck) calling the police on me, until I finally gave up trying to see or speak to my kids, for fear of constantly getting falsely arrested or harassed by corrupt local police who were always on her side.

14. Because I filed these protected speech government complaints, and requests for government investigation, various communist, leftist, socialist, Democrat African-American and their predominantly Jewish supervisors and LGBTQ+ government employees (and leftist, Democrat, communist, activist billionaire outsiders) of the Attorney Grievance Committee 1st Department (“AGC”) pushed and prodded Jorge Dopico, Chief Counsel, to go after me and my law license by pulling up, rather dishonestly and desperately, any and all “discriminatory acts” that they could find, aided and abetted by scores of my enemies both public and private, past and present, even though not ONE of their “exhibits” that they pulled up, could be 100% attributed to me.

15. It was bad enough that I was retaliated against, by various governmental agencies, in retaliation for filing legitimate government complaints and requests for investigation (whistleblower protection) but the fact that they then used an 80-year-old invalid to adjudicate these

“exhibits” was altogether Elder Abuse, Department of Labor violations (New York State and Federal), and other criminal and unethical conduct.

16. Even worse, Rosalyn Richter, this “Appointed Referee,” was a well-known lesbian extremist, leftist, judicial activist, Democrat, and sexual deviant, who was totally biased and conflicted against me, a well-known republican, Christian, conservative, heterosexual, Indian American male, who at one time even explored running for the New York City Council in 2008 during the Obama presidency on the Republican ticket, and because her law firm/NGO “Sanctuary For Families,” a hotbed of extreme feminist lesbian activity had, in the past 20 years, represented no less than 5 of my exes (also named) in “lawfare” litigation against me at the behest and instigation of my ex-wife Sharie Maes (aka Sharie Manon, Sharie Kruzic, Sharie O’Buck), for free, in the New York City family courts, civil courts, criminal courts, and supreme courts.

17. The sheer shamelessness of this open, overt, and bold faced audacity to choose this biased, broken, morally, physically, and mentally unstable old woman Rosalyn Richter, to determine if I should be able to continue to practice law or not, to be able to earn a living and take care of my new family or not, while she was barely able to read her own notes, simply because I would not “hook line and sinker” swallow both her and her organizations’ communist, leftist, socialist, Democrat, LGBTQ+ sexual values, proclivities, and deviance, which are against my own conservative, traditional, Christian religious beliefs, were nothing short of egregious violations of the United States Constitution 1st Amendment right for freedom of speech, expression, and religious freedom, 5th Amendment right to Due Process, 6th Amendment right to confront ones accusers or question the evidence against you, but also, in the greater picture, even if any one of the “exhibits” or “evidence” that the AGC submitted to the Appellate Division and Rosalyn Richter COULD be attributable to me, they were still protected free speech and expression, pursuant to the 1st Amendment of the

United States Constitution.

18. None of the “exhibits” that they presented contained “fighting words,” or “hate crimes,” or “incitement to violence,” or any other types of limited proscribed speech, and nearly all of their “snippets” were either advised, counseled, written, posted, or attributable to any one of the hundreds of professionals that have worked for me over the past 25 years - and they were all named in my defense papers - ethics lawyers, *per diem* lawyers, full time associate attorneys, full time of counsel attorneys, law clerks, paralegals, online search engine optimization advertisers and marketers, professional and amateur book publishers, and tons more, such as my ethics attorneys Richard Maltz former assistant chief of the attorney disciplinary committee first department, Hal Lieberman also a former chief of the attorney disciplinary committee first department, Lew Tesser, Michael Ross, Kelly McCollum, Pery Krinsky, David Lewis, Richard Grayson, and their own fellow AGC Committee members Jeremy Garber, Norma Lopez, Joel Peterson, Elizabeth Palladino, Devika Kewalramani, and scores of other nameless and faceless grievance committee first department staff members who manned the AGC ethics hotlines and phone call inquiries, or even my own private lawyers such as my Of Counsel Anthony Motta, Robert Androsiglio, Dominic Sarna, Luis Trujillo, Mawash Jaffery, Marcus Nussbaum, Elliot Schlissel, Paul Carty, John Fazzio, Adam Edelstein, Todd Spodek, Kelly McCollum, Michael Ross, Pery Krinsky, David Koch, Samson Freundlich, and countless others from *per diem* companies, online attorney matching services, all of whom were specifically named as the authors, preparers, and signatories of the pleadings that AGC Staff Attorney Remi Shea sought to punish and charge me for.

19. One would be hard pressed, if one were to look with a magnifying glass over the course of anyone’s life, wherein there would be zero incidents of supposedly

“discriminatory conduct, comments, or statements,” that could somehow be blamed on you.

20. But even worse, and more egregiously, in the trial court/arbitration, we proved with clear and convincing evidence, posted publicly, the names and professional titles of those individuals who in fact, were responsible for them.
21. This, however, was no obstacle for the AGC or the Appellate Division, or the clinical mental and physical vegetable Arbitration Referee Rosalyn Richter, who simply waived away all of my constitutional, statutory, and case law arguments and defenses, and simply decreed that “Respondent (myself) was not credible.”
22. Since the effect of removing the right of a man to work in his chosen legal profession, after perfecting and honing it for 25 years, at the ripe old age of 52, is tantamount to a death sentence to himself and his family (including young children), Plaintiff deserves much better than this.
23. Plaintiff, who was a celebrated and well recognized member of the New York State Bar since 2002, had appeared as a Law Expert on hundreds of television programs, scores of CLE teaching classes, even teaching at the John Jay College of Criminal Justice in Manhattan New York.
24. However, an extremist group of left wing, communist, identity politics obsessed, biased, misguided, leftist, socialist, Democrat, and angry activists infiltrated within the New York City government, were able to hijack the entire New York City

(Manhattan) court system, its process, and churn out a singularly unjust, unfair, illegal, and immoral judicial order - that of permanent Disbarment from the practice of law, with no hope for reinstatement.

25. No suspension, no interim relief, no warnings, not even any language allowing me to re-apply for admission.
26. Rather, a simple, draconian, defamatory, slanderous, libelous death sentence, simply for exercising protected speech, expression, simply for filing government protected complaints, requests for investigation, and civil rights lawsuits alleging bias, discrimination, and racism by various New York City government officials, which these reactionary, activist, communist, leftist judges then labeled as “vexatious litigation,” “offensive,” “racist,” “homophobic,” or “anti-semitic,” of which they were neither, just facts.

President Donald J. Trump’s Executive Orders, Presidential Proclamations, Executive Actions, and His Administration’s Corrective Actions Taken After the 2024 Election

27. Even more egregiously, even though Diversity, Equity, Inclusion (“DEI”) hire Chief Judge Rowan Wilson of the New York State Court of Appeals was promptly and duly notified of certain corrective actions taken by the incoming Republican President Donald J. Trump administration, he simply defied and ignored these presidential executive actions, orders, and proclamations, as well as new federal laws, including but not limited to:
 - (I) that the below named government workers not only violated the United States and New York Constitutions as described above, but also as well, the spirit and rule of President Donald Trump’s Presidential Proclamations, Executive Orders, and Executive Actions, such as:

Federal Register :: Ending the Weaponization of the Federal Government

Federal Register :: Restoring Freedom of Speech and Ending Federal Censorship

Federal Register :: Initial Rescissions of Harmful Executive Orders and Actions

2025-01953.pdf Government Agencies and Employees: DEI Programs and Preferencing; Efforts To End (EO 14151), to which we respectfully requested the immediate restoration of my New York State Attorney License to Practice Law, as well as re-admission to the Southern District of New York and U.S. Court of Appeals for the 2nd Circuit ability to file and practice without having to seek judicial permission before filing, as well as my right to practice law before the Executive Office for Immigration Review and U.S. Department of Homeland Security in my successful 23-year-long Immigration Law practice which was revoked after New York State disbarment,

(II) we also advised and reminded DEI hire Chief Judge Rowan Wilson that on February 6, 2025, President Donald J. Trump issued a Presidential Action Executive Order entitled “Eradicating Anti-Christian Bias,” which further underscored the wrongs that were perpetrated against me, my family, my children, my law firm business, and my NYS law license as indicated in <https://www.whitehouse.gov/presidential-actions/2025/02/eradicating-anti-christian-bias/> for which we again respectfully requested (1) immediate restoration of my NYS Attorney License to Practice Law, (2) re-admission to the SDNY & US Court of Appeals 2nd Circuit ability to file & practice without having to seek judicial permission before filing, and (3) my right to practice law before the EOIR and U.S. Department of Homeland Security,

(III) furthermore, we advised the U.S. Department of Justice that NYS Judges Rosalyn Richter, Dianne Renwick, Rowan Wilson, Jenny Rivera, NYS Government Employees Attorney Grievance Committee 1st Department Staff Attorneys Remi Shea, Andrea Carter, Chief Counsel Jorge Dopico, and DOJ Federal Government

Employee Paul Rodrigues and DHS Federal Government Employee Amy Paulick, violated the U.S. & New York Constitutions, but also the spirit/rule of President Donald Trump's Presidential Proclamations, Executive Orders and Executive Actions listed above, and again respectfully requested the above mentioned relief, but again NYS Court of Appeals Chief Judge Rowan Wilson and his court defied and ignored this request,

(IV) we also promptly notified the NYS Court of Appeals of the new development that even the American Bar Association ("ABA") believed that their own rules (especially Rule 8.4) are corruptible and weaponized by leftist, Democrat, communist, activist, socialist government employees against certain targeted lawyers for political reasons, and explained to them that this was tantamount to a complete reversal of the frivolous and fraudulent grounds for which the NYS Attorney Grievance Committee 1st Department and NYS Appellate Division 1st Department unfairly and fraudulently disbarred me last November 21, 2024, even when the evidence showed that I was not even solely responsible for the protected speech pleadings, or government complaints, that they bizarrely and illegally found to be "offensive," "vexatious," "racist," "homophobic," or "anti-semitic,"

(V) and on March 2, 2025 undersigned notified the NYS Court of Appeals that even further to the above, the American Bar Association ("ABA") had reversed its policies on DEI by suspending its enforcement of diversity, equity, and inclusion ("DEI") standards, whereby this decision, tied to Rule 206, came amidst legal and political pressures, including executive orders targeting DEI initiatives, and that the ABA planned to review and revise its DEI policies to ensure compliance with evolving laws - since the ABA promulgates all "ethics rules" picked up and followed by the New York State Attorney Grievance Committee First Department, which charged and disbarred me unethically, immorally, and illegally in retaliation simply for my filing protected speech government complaints and civil rights lawsuits, protecting my children and my family after 20 years of political torture, bias, and discrimination in the NYC judicial system, we argued to the court that this development should weigh heavily on them in order to reverse the lower court's draconian and bizarre ruling which

completely took away my right to work, feed my family, and pay our bills because I was defending my family and children after 20 years of suffering and complaining to the government to help us, (VI) also on March 2, 2026 we asked the NYS Court of Appeals to take judicial notice that the Federal Trade Commission ("FTC"), under new chairman Andrew Ferguson, had cut all ties with the ABA due to exactly this leftist, communist, socialist, activist, extremist Democrat behavior when he stated that the ABA has a "long history of leftist advocacy," and announced that the FTC was "over" the American Bar Association, specifically stating that new FTC policy "prohibits FTC political appointees from holding leadership roles in the American Bar Association ("ABA"), participating in ABA events, or renewing their ABA memberships...Additionally, the FTC will no longer use its resources to support any employee's ABA membership or participation in ABA activities,"

(VII) finally, undersigned wrote a letter to the United States House and Senate Republicans on the Judiciary and Bankruptcy Committees that the overwhelmingly Democrat, leftist, communist, NYS Court of Appeals would not rule on my Appeal of my 11/2024 Attorney Disbarment merely for expressing my conservative, republican, christian, heterosexual value systems, and beliefs, and for simply filing government complaints and civil rights lawsuits to enforce those Constitutional Rights to defend and protect my children, and that they punished me because I was a well-known Republican and Trump Supporter since 2015, who signed up to work with Attorney Harmeet Dhillon at the Republican National Lawyers Association to fight for President Donald Trump, and that I had also written countless books and op-eds defending Donald Trump and his family from attacks by the communist, leftist, Democrat media since at least 2015/6 in my Deep State Defector book series 1 through 6, as well as in online periodicals Modern Diplomacy, Eurasia Review, TruePundit.com with Thomas Paine, and countless other online periodicals, and so we needed urgent intervention and help, as I needed to support my family and work again, advising these committees that I

was now forced to apply for Unemployment Insurance, that I have 3 children, am about to lose our home, I am also in bankruptcy proceedings because of these people where SDNY Bankruptcy Judge Sean Lane (the same Obama-appointed federal district judge who publicly humiliated and tortured former NYC ("America's Mayor) Rudolph Giuliani had also been torturing me for the last 2.5 years, delaying and denying my bankruptcy discharge, and that my startup real estate broker business was not doing very well,

(VIII) we also advised these House and Senate committees that we were receiving threats and harassment from this Obama-appointed SDNY Bankruptcy Judge Sean Lane, located at 300 Quarropas Street, White Plains, NY 10601, who, as I previously reported, is typical of these Trump-hating federal district judges in the Southern District of New York, who not only block President Donald J. Trump's Executive Orders, Presidential Proclamations, and Executive Actions, but then also take out their anger, abuse, intimidation, threats, harassment, torment, torture, and targeting on his loyal supporters such as myself, who has, for the past 10 years, written countless Op-Eds, Books (Deep State Defector books 1 through 6), defending President Donald J. Trump, his family, and his policies against their Communist, Leftist, Democrat, Extremist, Activist, "lawfare" tactics against me, my children, and my family as retribution, disbarring me from 25 years of successful law practice, calling me such insults as "vexatious litigant," when every single pleading, or complaint, that I have ever drafted, was in defense against their unprovoked lawfare onslaught against me, my children, and my family, first (we explained that these federal district judges parrot each other, as well as litigation opponents, using the phrase "vexatious litigant" used by these Communist Democrats as both a sword and a shield, to remove any and all constitutional and civil rights from their dehumanized targets, such as basic appeal rights, notice rights, and other inalienable human rights guaranteed by the United States Constitution, basically analogous to calling a lawyer or a litigant a "terrorist," thus removing

31. And all of this was done in gross and overt violation of the 1st, 5th, and 6th Amendments to the United States Constitution, the New York State Constitution's correlated provisions NY Const Art I §§ 6, 8, and even recent case law in the last few months reiterating that even Lawyers have first amendment rights, and cannot be unfairly and unduly silenced by biased, discriminatory, anti-American, and anti-Constitution infiltrators of the United States government, whether federal, state, or local.
32. In our case, we alleged violations of the United States Constitution 1st, 5th, and 6th Amendments in the New York State Court of Appeals as well as in our *Ex Parte* Emergency Order to Show Cause for a Temporary Restraining Order and/or Preliminary Injunction based on immediate and imminent threats to Plaintiff's due process rights to life, liberty, and property, infringement of his free speech and free expression, as well as impinging and obstructing Plaintiff's right to confront his accusers, question the evidence before him, have a competent and unbiased arbitrator or judge affecting his life, liberty and property.
33. We argued that the appeal was as a matter of right per CPLR § 5601(b)(1) because it was from an order of the appellate division which finally determines an action where there is directly involved the construction of the constitution of the state or of the United States.
34. The relevant portions of the New York State Constitution are Article I - Bill Of Rights, Section 8 - Freedom of speech and press, as well as Article I - Bill Of Rights, Section 6 - protection of certain enumerated rights, and even pursuant to CPLR §§ 5601(c) and (d), wherein an appeal may be taken to the court of appeals as of right in an action originating in an administrative agency (Attorney Grievance Committee 1st Dept), from an order of the appellate division granting where the appellant stipulates that, upon affirmance, judgment absolute shall be entered against him, or from a final determination of an administrative agency (Attorney Grievance Committee 1st Dept) or from a final arbitration award (Arbitrator Rosalyn Richter), or from an order of the appellate division which finally determines an appeal from such a judgment or determination (multiple), where the appellate

division has made an order on a prior appeal (multiple) in the action which necessarily affects the judgment, determination or award (Arbitrator Rosalyn Richter).

Recent Divided Nationwide Case Law

35. Recent court cases have addressed concerns that attorney discipline committees may infringe upon lawyers' constitutional rights, particularly regarding freedom of speech and due process.
36. Notable examples include Connecticut's Anti-Discrimination Rule.
37. In December 2024 (only a few days after this same shameless circuit court disbarred me for the same protected activity), the U.S. Court of Appeals for the Second Circuit revived a lawsuit challenging Connecticut's professional conduct rule that prohibits attorneys from engaging in "harassment or discrimination" based on characteristics such as race, sex, and religion.
38. Attorneys Mario Cerame and Timothy Moynahan in Mario Cerame and Timothy Moynahan v. Christopher L. Slack, No. 22-3106 (2d Cir. 2024) argued that this rule violated their First Amendment rights by potentially restricting discussions on topics like critical race theory and religious expression.
39. The appellate court determined that the plaintiffs had standing to pursue their claims, citing a "credible threat of enforcement" that could chill protected speech.
40. Oregon State Bar's Anti-Trump Statement.
In August 2024, the Ninth U.S. Circuit Court of Appeals ruled in Daniel Crowe, et al v. Oregon State Bar, et al, No. 23-35193, D.C. No. 3:18-cv02139-JR that the Oregon State Bar violated a lawyer's

Constitutional rights by publishing a statement critical of former President Donald Trump in a bar-funded magazine.

41. The court found that this action compelled members to associate with political views they might not endorse, infringing upon their First Amendment rights.
42. California's Moral Character Evaluations.
43. In December 2024, the State Bar of California announced that it would assess law applicants' participation in campus protests during moral character evaluations for licensing.
44. The Bar emphasized that evaluators must avoid considering protected political speech or expression, ensuring that applicants' First Amendment rights are not infringed upon during the review process.
45. Pennsylvania's Anti-Discrimination Rule.
46. In Greenberg v. Lehocky No. 22-1733 (3d Cir. 2023), the Third Circuit Court of Appeals addressed a challenge to Pennsylvania's Rule of Professional Conduct 8.4(g), which prohibits harassment and discrimination in the practice of law.
47. Attorney Zachary Greenberg argued that the rule infringed upon his First Amendment rights, as his continuing legal education presentations involved quoting offensive language from judicial opinions and discussing controversial topics.

48. The court's decision highlighted the tension between regulating professional conduct and protecting free speech.
49. New Jersey's Confidential Disciplinary Proceedings.
50. In R.M. v. Supreme Court of New Jersey 185 N.J. 208 (N.J. 2005), the New Jersey Supreme Court examined the constitutionality of Rule 1:20-9, which mandated confidentiality in attorney disciplinary proceedings.
 51. The court concluded that, as written and applied, the rule violated the First Amendment because it was not narrowly tailored to serve a compelling interest.
 52. This decision underscored the importance of transparency and the public's right to scrutinize the disciplinary process.
53. Kentucky Bar's Sanction for Criticism of a Judge.
54. In 2012, the U.S. Court of Appeals for the Sixth Circuit ruled that the Kentucky State Bar violated attorney John M. Berry Jr.'s First Amendment rights.
 55. Berry faced an ethics charge after criticizing the state Legislative Ethics Commission.
 56. The court found that the bar's actions infringed upon his right to free speech, emphasizing that attorneys do not forfeit their First Amendment protections.

57. Illinois Attorney Advertising Case.
58. In Peel v. Attorney Disciplinary Commission of Illinois 496 U.S. 91 (1990), the U.S. Supreme Court held that an attorney's advertisement stating his certification as a civil trial specialist was protected commercial speech under the First Amendment.
59. The Court determined that the Illinois Attorney Disciplinary Commission's sanction violated the attorney's free speech rights, as the advertisement was neither false nor misleading.
60. New York's Attorney Discipline System and Due Process.
 61. Discussions in legal circles have raised concerns about whether New York's attorney discipline system meets due process requirements.
 62. Critiques focus on the procedural aspects of the system, questioning if it adequately protects attorneys' constitutional rights during disciplinary proceedings.
 63. Critics focus on the procedural aspects of the system, questioning if it adequately protects attorneys' constitutional rights during disciplinary proceedings.
 64. In United States Trustee v. Delafield, et al., 57 F.4th 414 (4th Cir. 2023), the Court of Appeals considered the adequacy of due process afforded an attorney, who was sanctioned by the bankruptcy court.
 65. Following a four-day trial, the bankruptcy court entered an order (1) prohibiting the attorney from practicing before the court for one year, and (2) imposing a \$5,000 fine.

66. The order was affirmed by the district court and, on appeal to the Fourth Circuit, affirmed.

67. These cases and discussions highlight the ongoing interstate legal disputes surrounding the balance between regulating professional conduct, and safeguarding constitutional rights within the legal profession, and is thus, properly brought before this Honorable Court.

Dated: New York, NY
April 17, 2025



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MANCHANDA REAL ESTATE BROKER NEW YORK LLC		143
270 VICTORY BLVD (646)645-0993		50-791214
NEW ROCHELLE, NY 10804		
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<p>For <u>Capital One</u></p> <p><u>Filing Fee</u></p>		
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***State of New York
Court of Appeals***

*Decided and Entered on the
tenth day of April, 2025*

Present, Hon. Rowan D. Wilson, *Chief Judge, presiding.*

SSD 11

In the Matter of Rahul Dev Manchanda, &c.

Attorney Grievance Committee for the First
Judicial Department,
Respondent;
Rahul Dev Manchanda,
Appellant.

Appellant having appealed in the above title;

Upon the papers filed and due consideration, it is

ORDERED, that the appeal is dismissed without costs, by the Court sua sponte,
upon the ground that no appeal lies as of right from the unanimous order of the Appellate
Division absent the direct involvement of a substantial constitutional question
(*see* CPLR 5601).



Heather Davis
Clerk of the Court

COURT OF APPEALS
CLERK'S OFFICE
ALBANY, NY 12207-1095

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11 APR 2025 AM 21
Matter of Manchanda

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